

FILED

JUN 21 2022

CLERK U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY _____ DEPUTY CLERK

JARED MARTIN #1199594
Name and Prisoner/Booking Number
MADERA COUNTY JAIL
Place of Confinement
195 TOLER STREET
Mailing Address
MADERA, CA 93638
City, State, Zip Code

(Failure to notify the Court of your change of address may result in dismissal of this action.)

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

JARED ANDREW MARTIN
(Full Name of Plaintiff) Plaintiff,

v.

CASE NO. 1:22cv00748 EPG(PC)
(To be supplied by the Clerk)

(1) OFFICER NORTH CUTT
(Full Name of Defendant)

(2) SERGEANT WILLIAMS

(3) CHRISTIAN PEIFFER

(4) KATHLEEN ALLISON
Defendant(s).

☐ Check if there are additional Defendants and attach page 1-A listing them.

**CIVIL RIGHTS COMPLAINT
BY A PRISONER**

☒ Original Complaint

☐ First Amended Complaint

☐ Second Amended Complaint

RECEIVED

JUN 21 2022

A. JURISDICTION

CLERK U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY _____ DEPUTY CLERK

1. This Court has jurisdiction over this action pursuant to:

☒ 28 U.S.C. § 1343(a); 42 U.S.C. § 1983

☐ 28 U.S.C. § 1331; Bivens v. Six Unknown Federal Narcotics Agents, 403 U.S. 388 (1971).

☐ Other: _____

2. Institution/city where violation occurred: KERN VALLEY STATE PRISON

B. DEFENDANTS

1. Name of first Defendant: Officer Northcutt. The first Defendant is employed as:
Corrections Officer at Kern Valley State Prison.
(Position and Title) (Institution)
2. Name of second Defendant: Sergeant Williams. The second Defendant is employed as:
at Kern Valley State Prison.
(Position and Title) (Institution)
3. Name of third Defendant: Christian Pfeiffer. The third Defendant is employed as:
Warden at Kern Valley State Prison.
(Position and Title) (Institution)
4. Name of fourth Defendant: Kathleen Allison. The fourth Defendant is employed as:
Secretary at CDCR.
(Position and Title) (Institution)

If you name more than four Defendants, answer the questions listed above for each additional Defendant on a separate page.

C. PREVIOUS LAWSUITS

1. Have you filed any other lawsuits while you were a prisoner? ☒ Yes ☐ No
2. If yes, how many lawsuits have you filed? 3. Describe the previous lawsuits:

a. First prior lawsuit:

1. Parties: MARTIN v. CASTILLO
2. Court and case number: EASTERN DISTRICT 1:22-LV-00000
3. Result: (Was the case dismissed? Was it appealed? Is it still pending?) PENDING

b. Second prior lawsuit:

1. Parties: MARTIN v. TYSON J. ROGUE
2. Court and case number: EASTERN DISTRICT 1:22-LV-00560
3. Result: (Was the case dismissed? Was it appealed? Is it still pending?) PENDING

c. Third prior lawsuit:

1. Parties: MARTIN v. BUTIERREZ
2. Court and case number: 1:22-LV-00600
3. Result: (Was the case dismissed? Was it appealed? Is it still pending?) PENDING

If you filed more than three lawsuits, answer the questions listed above for each additional lawsuit on a separate page.

CLAIM II

1. State the constitutional or other federal civil right that was violated: 1st, Fourth, 5th, Sixth, 8th and 14th Amendments U.S. Constitution
2. **Claim II.** Identify the issue involved. Check **only one**. State additional issues in separate claims.
- | | | | |
|--|--|---|---------------------------------------|
| <input type="checkbox"/> Basic necessities | <input type="checkbox"/> Mail | <input type="checkbox"/> Access to the court | <input type="checkbox"/> Medical care |
| <input type="checkbox"/> Disciplinary proceedings | <input type="checkbox"/> Property | <input type="checkbox"/> Exercise of religion | <input type="checkbox"/> Retaliation |
| <input type="checkbox"/> Excessive force by an officer | <input checked="" type="checkbox"/> Threat to safety | <input type="checkbox"/> Other: _____ | |
3. **Supporting Facts.** State as briefly as possible the FACTS supporting Claim II. Describe exactly what **each Defendant** did or did not do that violated your rights. State the facts clearly in your own words without citing legal authority or arguments.
- SERGEANT WILLIAMS did NOT try to stop NORTHCOFF from BEATING me. WILLIAMS ALSO DENIED me MEDICAL TREATMENT FOR THE INJURIES. SERGEANT WILLIAMS TRIED TO COVER UP WHAT HAPPENED BY HIDING me IN WHAT CALLED A JAIL OVERFLOW. HE (WILLIAMS) REFUSED to REPORT THE ATTACK BY NORTHCOFF. SERGEANT WILLIAMS ALSO told me to KEEP QUIET about WHAT HAPPENED OR THERE WOULD BE MORE VIOLENCE AGAINST me. WILLIAMS THREATENED me ON AT LEAST THREE OTHER OCCASIONS BECAUSE I CONTINUED to put in box staff complaints about him AND NORTHCOFF. I WAS ASSAULTED, THREATENED to get killed, they DESPOILED took AND hid my LEGAL PAPERS AND PROPERTY. WILLIAMS CONTINUED to LIE about THE INCIDENT AND CLAIM HE WAS NOT THERE WHEN IT HAPPENED. WILLIAMS WAS THERE AND COVERED IT UP. SINCE THAT DAY MARCH 9, 2021, NORTHCOFF HAS ATTACKED me AGAIN BOTH HE AND WILLIAMS HAVE THREATENED to HURT me.
4. **Injury.** State how you were injured by the actions or inactions of the Defendant(s).
- I HAD to GO WITHOUT MEDICAL TREATMENT, I WAS DENIED my LEGAL PAPERS. I WAS UNABLE to GET HELP from prison employees. I HAVE SUFFERED MENTAL AND PHYSICAL PAIN.
5. **Administrative Remedies.**
- Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? ☒ Yes ☐ No
 - Did you submit a request for administrative relief on Claim II? ☒ Yes ☐ No
 - Did you appeal your request for relief on Claim II to the highest level? ☒ Yes ☐ No
 - If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. _____

CLAIM III

1. State the constitutional or other federal civil right that was violated: 1ST, 4TH, 5TH, 6TH, 8TH AND 14TH AMENDMENTS UNITED STATES CONSTITUTION.
2. **Claim III.** Identify the issue involved. Check **only one**. State additional issues in separate claims.
- | | | | |
|--|--|---|---------------------------------------|
| <input type="checkbox"/> Basic necessities | <input type="checkbox"/> Mail | <input type="checkbox"/> Access to the court | <input type="checkbox"/> Medical care |
| <input type="checkbox"/> Disciplinary proceedings | <input checked="" type="checkbox"/> Property | <input type="checkbox"/> Exercise of religion | <input type="checkbox"/> Retaliation |
| <input type="checkbox"/> Excessive force by an officer | <input type="checkbox"/> Threat to safety | <input type="checkbox"/> Other: _____ | |
3. **Supporting Facts.** State as briefly as possible the FACTS supporting Claim III. Describe exactly what **each Defendant** did or did not do that violated your rights. State the facts clearly in your own words without citing legal authority or arguments.
- THOSE CORRECTIONAL OFFICERS BEAT ME AND
TOOK MY LEGAL DOCUMENTS, COURT PAPERS AND
PROPERTY. THEY INTENDED TO PREVENT ME FROM
GETTING MY BELONGINGS AND GETTING INTO THE
COURT. WILLIAMS AND NORTHUTT AND OTHERS WHO WERE
PRESENT KNEW I HAD ACTIVE CASES IN COURT
BECAUSE I TOLD THEM. THOSE MEN INTENDED TO
MAKE ME AND MY PROPERTY DISAPPEAR. I CONTACTED
WARDEN CHRISTIAN PFEIFFER AND KATHLEEN ALLISON
THE SECRETARY OF CALIFORNIA DEPARTMENT OF
CORRECTIONS AND REHABILITATION. BOTH CHRISTIAN PFEIFFER
AND KATHLEEN ALLISON KNEW I HAD BEEN BEATEN,
THEY WERE AWARE NORTHUTT AND WILLIAMS CONTINUED
TO HARASS AND ABUSE AND TORTURE ME. NITTAH
ALLISON NOB PFEIFFER LIFTED A FINGER TO STOP THE
MISCONDUCT, TORTURE, ABUSE AND TERRORISM.
4. **Injury.** State how you were injured by the actions or inactions of the Defendant(s).
5. **Administrative Remedies.**
- Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? ☒ Yes ☐ No
 - Did you submit a request for administrative relief on Claim III? ☒ Yes ☐ No
 - Did you appeal your request for relief on Claim III to the highest level? ☒ Yes ☐ No
 - If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. _____

If you assert more than three Claims, answer the questions listed above for each additional Claim on a separate page.


E. REQUEST FOR RELIEF

State the relief you are seeking:

I WANT ALL FOUR DEFENDANTS FIRED AND ARRESTED. I WANT STATE AND FEDERAL JUSTICE DEPARTMENT INVESTIGATION OF KERN VALLEY STATE PRISON AND CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION. I WANT U.S. ATTORNEY ASSISTANCE AND FBI PROTECTION. THESE PEOPLE ARE TRYING TO MURDER ME. I WANT 200 million DOLLAR IN DAMAGES. THESE ACTIONS ARE UNLAWFUL, SADISTIC, MALICIOUS, TORTURE, UNCONSTITUTIONAL.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on JUNE 9, 2022
DATE


SIGNATURE OF PLAINTIFF

(Name and title of paralegal, legal assistant, or other person who helped prepare this complaint)

(Signature of attorney, if any)

(Attorney's address & telephone number)

ADDITIONAL PAGES

All questions must be answered concisely in the proper space on the form. If you need more space you may attach more pages, but you are strongly encouraged to limit your complaint to twenty-five pages. If you attach additional pages, be sure to identify which section of the complaint is being continued and number all pages. Remember, there is no need to attach exhibits to your complaint.